

**REMARKS**

Claims 1 through 17, 19 through 35, 37 through 53, 55 through 71, and 73 are pending in this application. Applicants propose amending claims 1, 19, 37, 55, and 73. Support for the amendments may be found, for example, at paragraphs [0110] through [0119] of the application. Applicants propose canceling claim 59. No new matter has been added.

***Rejections Under 35 U.S.C. § 102(e)***

Claims 1-2, 4-5, 8, 17, 19-20, 22-23, 26, 35, 37-38, 40-41, 44, 53, 55-56, 58-59, 62, 71, and 73 stand rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. patent 6,744,451 (hereinafter “Anderson”).

Claims 3, 7, 21, 25, 39, 43, 57, and 61 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Anderson in view of U.S. patent 6,122,033 (hereinafter “E. Anderson”).

Claims 6, 24, 42, and 60 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Anderson in view of U.S. patent 6,336,052 (hereinafter “Ouellet”).

Claims 9, 27, 45, and 63 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Anderson in view of U.S. patent 6,968,215 (hereinafter “Muramatsu”).

Claims 10-11, 28-29, 46-47, and 64-65 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Anderson in view of U.S. patent 7,146,005 (hereinafter “Anft”).

Claims 12-15, 30-33, 48-51, and 66-69 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Anderson in view of U.S. patent 6,559,831 (hereinafter “Armstrong”).

Claims 16, 34, 52, and 70 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Anderson in view of U.S. patent 6,703,550 (hereinafter “Chu”).

Reconsideration is respectfully requested in view of the above amendments and the following remarks.

Claim 1 recites:

A user interface system, said system comprising a plurality of logical buttons and their physical equivalents,

said physical equivalents being arranged symmetrically in a multi-dimensional manner,

wherein a first subset of said physical equivalents is mapped to correspond to symmetrical logical buttons for either horizontal movement or vertical movement,

wherein a second subset of said physical equivalents is mapped to correspond to asymmetrical logical buttons having functionality unrelated to each other, and

**wherein upon physical reorientation of the user interface system, each of said physical equivalents is remapped to another of the logical buttons.**

In order for a prior art reference to anticipate this claim, or render it obvious, the recited language and its combination in the recited arrangement must be taught by the prior art. The undersigned respectfully submits that the cited references do not teach the emphasized language and therefore cannot possibly teach or even suggest the recited combination.

Anderson discloses a selection system with audible cues to allow a user of a handheld computer system to locate a desired item from a list. (Col. 1, ll. 45-47). The system uses two different inputs associated with two different letter subsets: A to M and N to Z. (Col. 1, ll. 50-52). In connection with Figure 6d, a handheld computer may appear in a scroll state 550. (Col. 9, ll. 13-29). In the scroll state, the user may scroll up or down using buttons 636 and 633. (Col. 9, ll. 13-29). After the user has selected a particular entry from the displayed list, the user may open the selected entry by pressing button 612, or 625. (Col. 9, ll. 13-29). Alternatively, the user can exit the fast lookup by selecting button 611 or 624 associated with exiting. (Col. 9, ll. 13-29).

In contrast with the claim 1, Anderson does not disclose or suggest a device wherein **“upon physical reorientation of the user interface system, each of said physical equivalents is remapped to another of the logical buttons.”** Indeed, Anderson makes no suggestion that the functionality of buttons 611, 612, 624, and 625 changes upon reorientation of the device..

E. Anderson discloses an apparatus for changing operating modes of an image capture device. (Abstract). E. Anderson discloses a camera 110 comprising an LCD screen 402, a four way navigation control button 409, and a shutter button 418. (Col. 5, ll. 23-25). The four way navigation control button 409 provides the user interface with four buttons: left/right buttons 410a and 410b, which have a horizontal orientation; and up/down buttons 411a and 411b, which have a vertical orientation. (Col. 5, ll. 25-32). In connection with Figure 7, E. Anderson describes that the user may scroll through the full-sized images in the LCD screen 402 using the left/right buttons 410. (Col. 6, ll. 45-48). When the camera has a plurality of operating modes, the user can access a mode from another operating mode by pressing the vertical navigation buttons 411a and 411b. (Col. 7, ll. 1-3).

Thus, E. Anderson discloses a four button user interface wherein two horizontally oriented buttons 410a, 410b are used to scroll through images and the vertically oriented buttons 411a, 411b are used to move between modes of operating the device. In contrast with claim 1, E. Anderson does not disclose a device wherein **“upon physical reorientation of the user interface system, each of said physical equivalents is remapped to another of the logical buttons.”** Indeed, E. Anderson does not appear to suggest that the functionality of buttons 410a, 410b, 411a, and 411b is remapped when the interface is reoriented.

The remaining references similarly fail to teach or suggest the emphasized claim language as well.

Therefore, because Anderson, E Anderson, and the remaining references fail to disclose the emphasized claim language, they cannot be said to anticipate or even render obvious the recited combination of claim 1. While the language of the remaining independent claims 19, 37, 55, and 73 is different, for reasons analogous to those described above, these claims are likewise neither anticipated nor rendered obvious. Furthermore, all pending dependent claims are likewise patentable for being dependent upon a non-obvious independent claim.

Reconsideration and withdrawal of the rejections under 35 U.S.C. §§ 102, 103 is respectfully requested.

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**PATENT**

### **CONCLUSION**

The undersigned respectfully submits that pending claims are allowable and the application in condition for allowance. A Notice of Allowance is respectfully solicited.

Examiner Muhebbulah is invited to call the undersigned in the event a telephone interview will advance prosecution of this application.

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